

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 11
)
VIRGIL F. LIPTAK d/b/a DESIGNED) Case No. 03 B 29854
FINANCIAL SERVICES,)
)
Debtor and Debtor in Possession.) Judge Jacqueline A. Cox
) December 3, 2003, 9:30 A.M.

NOTICE OF MOTION

To: See attached service list

PLEASE TAKE NOTICE that on December 3, 2003, at 9:30 A.M., I shall appear before the Honorable Jacqueline A. Cox, or any other Judge sitting in her stead, in Courtroom 619, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and shall then and there present the Debtor's Motion to Extend Time for Filing Disclosure Statement and Plan and Objections to Claims. At which time and place you may appear and be heard.

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Forrest L. Ingram

One of its attorneys

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS

DEC - 1 2003

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CERTIFICATE OF SERVICE

I, Crystal Brown, a non-attorney, certify under penalty of perjury, that I served a true and correct copy of the above and foregoing notice and the document to which it refers on the parties entitled to notice by facsimile transmission to the fax numbers on the attached Service List, from 79 W. Monroe, Chicago, Illinois before 5:00 P.M. on December 1, 2003.

Crystal Brown

Crystal Brown

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002	OK	*	1214688803	006/006	00:01:21
003	OK	*	11118771863	006/006	00:00:49
004	OK	*	12146913326	001/006	00:03:29

-FORREST L INGRAM PC

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Fax

To: Kathryn Gleason	From: Forrest L. Ingram
Fax: 312-886-5794	Pages: 5
Phone:	Date: December 1, 2003
Re: Virgil Liptak	CC: Michael Atchley (214) 468-8803
	Thomas Michel (817) 877-1863
	Virgil Liptak (214) 691-3326

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**DEBTOR'S MOTION TO EXTEND TIME FOR FILING
DISCLOSURE STATEMENT AND PLAN AND OBJECTIONS TO CLAIMS**

Debtor and Debtor in Possession VIRGIL F. LIPTAK, by and through his attorneys at FORREST L. INGRAM, P.C., respectfully request that the Court extend the time for filing his disclosure statement and plan and objections to claims. In support of the motion, Debtor states as follows:

1. Debtor filed his voluntary petition for relief under chapter 11 *pro se* on July 16, 2003. Debtor, no represented by counsel, remains in possession of his assets and continues to pursue his business interest pursuant to 11 U.S.C. § 1107 and § 1108.

2. On September 23, 2003, the Court extended the time for Debtor to file his disclosure statement and plan to December 1, 2003, and set a status hearing on the disclosure statement and plan on November 19, 2003 at 2:00 P.M. Shortly thereafter, the Court extended the time to file objections to claims to Sunday, November 30, 2003 (effectively, December 1, 2003).

3. On September 23, 2003, this Court held an evidentiary hearing on the motion of Elizabeth Thornhill to dismiss Debtor's chapter 11 case. At the conclusion of the hearing, the Court took the matter under advisement.

4. To date, the Court has not ruled on the motion to dismiss.

5. As a matter of judicial economy and orderly administration of the estate, it is in the best interest of Debtor and his creditors to extend the time for filing a disclosure statement and plan, as well as objections to claims, until after the Court rules on the pending motion to dismiss the case.

6. Assuming that this Court determines not to dismiss Debtor's chapter 11 case, Debtor will need at least 30 days to prepare, review, and document his disclosure statement and plan.

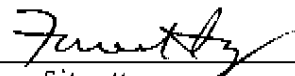
7. Debtor intends to provide in his plan a reasonable time frame for objecting to claims, a practice common in this District and not forbidden by the Code.

WHEREFORE, Debtor respectfully requests that this Court extend the time for Debtor to file a disclosure statement and plan to a date forty-five (45) days after the Court's ruling on the pending motion to dismiss. Debtor further asks this Court to allow Debtor to include in his Plan a provision that Debtor may file objections to claims within a reasonable period after confirmation of Debtor's plan. Debtor prays for such other and further relief as may be just.

Respectfully submitted,

VIRGIL F. LIPTAK d/b/a
DESIGNED FINANCIAL SERVICES

By:


One of its attorneys

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